

To:

Chambers of Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
via email delivery

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, 1:17-mc-00151

Your Honor,

After speaking with your chambers staff earlier today, I am writing in my capacity as a reporter for the *Wall Street Journal* to respectfully request permission to listen, either remotely via CourtCall or in person, to the scheduled August 3 oral argument in this action.

The *Journal* has previously covered this action and others between the Republic and its judgment creditorsⁱ. The outcome of this matter carries significant implications for the Republic, for Petróleos de Venezuela SA and for their creditors. It also has implications for Citgo, a U.S. company with 3,400 employees that is the ultimate target of Crystallex's pending motions. Citgo's ownership has also been a frequent subject of attention in the U.S. Congress.ⁱⁱ

As noted in docket entry 68, counsel at the August 3 conference are likely to discuss issues including the corporate separateness between Citgo and PdVSA and the status of the Crystallex settlement with Venezuela which are not public but would be additive to the public knowledge.

Given the public interest in this case, I ask for your permission to monitor the August 3 arguments. Thank you in advance for your consideration.

Sincerely,

Andrew Scurria
Reporter

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ⁱ "As Venezuela's Default Risk Rises, Battle Heats Up For Control of Refiner Citgo," *The Wall Street Journal*, 4/17/2018, <https://www.wsj.com/articles/as-venezuelas-default-risk-rises-battle-heats-up-for-control-of-refiner-citgo-1494759601>

ⁱⁱ "U.S. Examines Russia's Grip on Citgo Assets," *The Wall Street Journal*, 5/18/2017, <https://www.wsj.com/articles/u-s-examines-russias-grip-on-citgo-assets-1495155049>